SWIDLER BERLIN LLP

The Washington Harbour
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116
Phone 202.424.7500
Fax 202.424.7647
www.swidlaw.com

April 25, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: Correspondence with BellSouth, WC Docket No. 04-36

Dear Ms. Dortch:

Vonage, through undersigned counsel, hereby submits correspondence from Mr. Jeffrey Citron, Chairman and CEO of Vonage Holdings Corp. ("Vonage") to Mr. William Smith, Chief Technology Officer of BellSouth Corporation ("BellSouth") dated April 25, 2005 (attached hereto as "Exhibit A"). This letter was sent in response to a letter to Mr. Citron from Mr. Smith dated April 20, 2005, and filed in the above-referenced docket by BellSouth on April 21, 2005.

Vonage submits this correspondence to the Commission to update the Commission on the status of Vonage's activities in requesting access to 911 interconnection with the RBOCs, as well as to supplement the Commission's IP-Enabled Services proceeding record.

Sincerely,

/s/
William B. Wilhelm, Jr.

Counsel for Vonage Holdings Corp.

cc: Kevin J. Martin, Chairman FCC
Kathleen Abernathy, FCC Commissioner
Michael J. Copps, FCC Commissioner
Jonathan S. Adelstein, FCC Commissioner
Dan Gonzales
John Stanley
Jessica Rosenworcel

cc (cont'd):

Michelle Carey
Scott Bergmann
Thomas Navin
Julie Veach
Pamela Arluk

Exhibit A

Letter from Jeffrey Citron, Vonage Holdings Corp., to William Smith, BellSouth Corporation (Apr. 25, 2005).

NENA E-911 I2 Elements List

VONAGE

Jeffrey Citron
Chief Executive Officer

April 25, 2005

VIA OVERNIGHT MAIL

Mr. William Smith
Chief Technology Officer
BellSouth Corporation
675 W. Peachtree Street N.E.
Suite 4515
Atlanta, GA 30375

Dear Mr. Smith

I write to respond to your April 20, 2005 letter regarding Vonage's request to obtain E-911 capabilities from Bell South.

While I am very encouraged to learn that Mr. Schwartz is now reviewing the documentation we provided earlier this month – I must take issue with your factual account of our coordination on these matters. In particular, Vonage has pursued these matters with all deliberate speed and you are mistaken to suggest otherwise.[1]

As we previously advised Bell South, Vonage currently supports the NENA I1 solution for emergency service call delivery. This solution is limited in a number of respects. Based upon my review of your company's April 19, 2005 FCC *ex parte* filing - I am pleased to learn that Bell South suggests that it is willing to provide support for the I2 capabilities requested by Vonage. While your letter and the FCC *ex parte* both suggest that Bell South currently makes available capabilities that might facilitate deployment of an I2 solution requested by Vonage, neither document contain any specific tariff references that might facilitate our review or evaluation of these offerings nor has Mr. Schwartz provided us with any such information.

As you are no doubt aware, the services that Qwest is providing to Vonage are not unique, and Bell South is equally capable of provisioning them. Qwest's offering to Vonage includes ESQK (pseudo ANI) assignment or acquisition, ESQK provisioning service, real-time ALI update access and transport for voice (to the selective router) and data (to the ALI servers.) Where available, Vonage will also obtain full use of the

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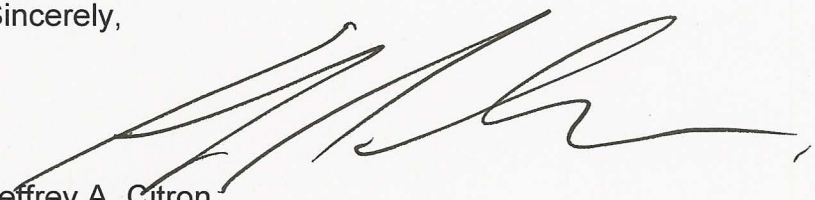
[1] There are a number of factual inaccuracies in your letter. For example, you suggest that Vonage did not coordinate with Mr. Schwartz. In fact Vonage met with Mr. Schwartz on March 29th, and April 4th and sent more detailed technical information by e-mail for his review on April 6th. It is untrue that Mr. Murray only forwarded this information after my letter to you on April 14th.

ESGW (shared gateway to all selective routers) structure to facilitate transport. There may be other services locally required, which are part of the standard wireline or wireless service configuration. For your convenience I am attaching a more detailed service description for your consideration.

Based upon your letter and the recent FCC *ex parte*, it would appear that Bell South is prepared to provide Vonage with the requested services. We look forward to hearing from Mr. Schwarz so that we can place an order for these services and begin provisioning as quickly as possible. If Mr. Schwartz is not the proper contact for order processing and provisioning of these services, we would be happy to work with another representative of Bell South to purchase direct access to these services.

Sincerely,



Jeffrey A. Citron

Attachment

cc: Kevin J. Martin, Chairman FCC
Kathleen Abernathy, FCC Commissioner
Michael J. Copps, FCC Commissioner
Jonathan S. Adelstein, FCC Commissioner
Gregory S. Ballentine, President APCO International
Charles M. Davidson, Commissioner, Florida Public Service Commission
Honorable Jeb Bush
Stan Wise, Commissioner, Georgia Public Service Commission
Deborah Taylor Tate, Director, Tennessee Regulatory Authority
Troy King, Attorney General Alabama
Honorable Charles "Chip" Pickering, Jr.
Honorable Cliff Stearns
Duane Ackerman, Chairman & CEO, BellSouth Corporation

VONAGE

THE BROADBAND PHONE COMPANY

April 15, 2005

Services Requested for E9-1-1

Summary

Vonage intends to comply with the NENA I-2 standard for delivery of Enhanced 9-1-1 calls to the correct PSAP. In order to accomplish this under the standard, Vonage or its vendors has to acquire services from the LEC in the served area.
The services required are ERQK (pseudo ANI) assignment or acquisition, ESQK provisioning service, Real time ALI update access and transport for voice (to the selective router) and data (to the ALI servers.) Where available, Vonage would like to make full use of the ESGW (shared gateway to all selective routers) structure to help facilitate transport. There may be other services locally required, which are part of the standard wireline or wireless service configuration.

ESQK Assignment

Vonage would like to have assigned the appropriate TNs to serve as ESQK pools for each PSAP. The quantity of numbers would be determined by Vonage's vendor based on the projected 9-1-1 call volume for each PSAP. Vonage would want non-dialable numbers, typically with an NXX of 511.

ESQK Provisioning

Vonage or the vendor would need access to the appropriate system or systems used to provision the ESQK pool for the selective router and the ALI database. Vonage would also request cooperation of the various PSAPs for the creation of the appropriate records in the MSAG in order to provision the ESQK pool. Vonage or the vendor would follow standard NENA formats, and would want ongoing access per the LEC standards.

Real-Time ALI Access

Vonage looks to process both native and non-native TNs in any given area. As such, Vonage would need to have access to the ALI system in order to provide time-of-call updates. The LEC would need to provide requirements for the ALI update interface or ALI steering protocols in use by the ALI system. Vonage or the vendor would need interface specifications from the LEC similar to those available for a wireless phase 2 NCAS implementation.

Transport – Voice

Vonage's first choice would be to acquire voice trunks to an ESGW that served all of the selective routers or 9-1-1 Tandems in a region. If that service is not available, Vonage would like access to ordering information, locations and specifications for trunk types for each selective router in the service area. SS7 trunk types would be preferred, but other signaling methods can be accommodated. Vonage intends to order two trunks for each selective router, one from each of two location diverse origination points. Vonage would also like to explore Internet access and a SIP gateway co-located with the selective router or 9-1-1 Tandem.

Transport – Data

For each ALI system in use in the service area, Vonage would like access to ordering information, locations and specifications for trunk types for each server, including any servers maintained at or by the PSAPs. Vonage or the vendor would order two trunks to each of the ALI server locations, one each from two location diverse origination points. Where possible, existing data links may currently exist between the vendor and the ALI servers for support of wireless 9-1-1, in which case these trunks may not be required. Standard data protocols as used for the wireless phase 2 NCAS solution would be the specifications of choice.